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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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CR23-00274 TUC-JCH(MSA)

UNITED STATES DISTRICT COURT

DISTRICT OF ARIZONA

United States of America,

Plaintiff,

v.

Mohammad Yunus Bin
Mohamed-Hashim,
(Counts 1-3)

Defendant.

INDICTMENT

VIOLATIONS:

8 U.S.C. § 1324(a)(1)(A)(v)(I)

8 U.S.C. § 1324(a)(1)(A)(ii)

8 U.S.C. § 1324(a)(1)(B)(i)

8 USC 1324 (a)(1)(B)(iii)

(Conspiracy to Transport Illegal
Aliens for Profit Placing in Jeopardy the
Life of Any Person)

Count 1

8 U.S.C. § 1324(a)(1)(A)(ii)

8 U.S.C. § 1324(a)(1)(B)(i)

8 U.S.C. § 1324 (a)(1)(B)(iii)

(Transportation of Illegal Aliens
for Profit Placing in Jeopardy the Life of
Any Person)

Counts 2-3

THE GRAND JURY CHARGES:

COUNT 1

From a date unknown to on or about February 4, 2023, in the District of Arizona, Mohammad Yunus Bin Mohamed-Hashim, did knowingly and intentionally combine, conspire, confederate, and agree with various other persons known and unknown to the grand jury, to transport and move illegal aliens within the United States by means of transportation or otherwise, in furtherance of such violation of law, and did so for the purpose of commercial advantage or private financial gain, and during and in relation to

1 which the defendant caused serious bodily injury to or placed in jeopardy the life of any
2 person, all in violation of Title 8, United States Code, Sections 1324(a)(1)(A)(v)(I),
3 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).

4 **COUNT 2**

5 On or about February 4, 2023, in the District of Arizona, Mohammad Yunus Bin
6 Mohamed-Hashim, knowing and in reckless disregard of the fact that an alien, Christian
7 Huerta-Hernandez, had come to, entered and remained in the United States in violation
8 of law, did transport and move said alien within the United States by means of
9 transportation or otherwise, in furtherance of such violation of law, and did so for the
10 purpose of commercial advantage and private financial gain, and during and in relation
11 to which the defendant caused serious bodily injury to or placed in jeopardy the life of
12 any person, in violation Title 8, United States Code, Sections 1324(a)(1)(A)(ii),
13 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).

14 **COUNT 3**

15 On or about February 4, 2023, in the District of Arizona, Mohammad Yunus Bin
16 Mohamed-Hashim, knowing and in reckless disregard of the fact that an alien, Apolinar
17 Puentes-Ramirez, aka Apolinar Puentes-Ramires, had come to, entered and remained in
18 the United States in violation of law, did transport and move said alien within the United
19 States by means of transportation or otherwise, in furtherance of such violation of law,
20 and did so for the purpose of commercial advantage and private financial gain, and
21 during and in relation to which the defendant caused serious bodily injury to or placed

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1 in jeopardy the life of any person, in violation Title 8, United States Code, Sections
2 1324(a)(1)(A)(ii), 1324(a)(1)(B)(i) and 1324(a)(1)(B)(iii).

3
4 A TRUE BILL

5
6 /s/
FOREPERSON OF THE GRAND JURY
7 Dated: March 1, 2023

8 GARY M. RESTAINO
9 United States Attorney
District of Arizona

REDACTED FOR
PUBLIC DISCLOSURE

10
11 /s/
SARAH J. PRECUP
12 Assistant U.S. Attorney